



534 BROADHOLLOW ROAD, SUITE 210  
PO Box 9034  
MELVILLE, NY 11747-9034  
(631) 694.2300 • FAX: (631) 694.2309

SERVICE BY FAX, EMAIL OR OTHER FORMS OF  
ELECTRONIC COMMUNICATION NOT ACCEPTED

MATTHEW J. MEHNERT  
PARTNER

DIRECT DIAL: (631) 414.5856  
DIRECT FAX: (631) 454.3867  
[MMJ@LAMBBARNOSKY.COM](mailto:MMJ@LAMBBARNOSKY.COM)

August 5, 2021

**By ECF & Overnight Mail**

Hon. Anne Y. Shields, U.S.M.J.  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: **Sharpe v. County of Nassau, et al.**  
**Docket No.: 15-cv-6446 (GRB)(AYS)**

Dear Judge Shields,

This office is counsel to Defendants County of Nassau, Nassau County Police Department and Thomas Dale (“the County Defendants”) in the above-entitled action. Following the July 22, 2021 conference in this matter, counsel for Plaintiff and I have been in communications in an effort to potentially resolve any outstanding issues regarding documents that have been redacted from the most recent round of production and which were identified in a Redaction Log produced by my office. I am happy to report that the parties were able to work out most of those issues without the need for motion practice.

The parties, however, agree that there are several documents that remain in question. To avoid the need for motion practice, and because of the relatively small volume of documents involved, the parties have agreed to submit those documents to the Court for an in-camera review. These documents have not been produced to Plaintiff in unredacted form and, as a result, this prevents Plaintiff from meaningfully moving to compel as she is unaware of the documents’ contents. The County Defendants maintain that these documents are highly confidential and relate to the investigations that are not relevant to the facts of this case and have so identified them as such in the Redaction Log that was previously submitted to the Court. The parties request that the Court review the documents and then permit a brief opportunity for the parties to address the Court so as to bring this issue to a close. The parties respectively would like to reserve any and all rights following the Court’s review of the documents.

The documents are being submitted under separate cover solely to the Court along with a hard copy of this letter. Only this letter is being uploaded to the Court’s electronic filing system. Exhibit A constitutes the redacted versions of the documents and Exhibit B constitutes the unredacted versions (although they are marked for redaction).

Lamb & Barnosky, LLP

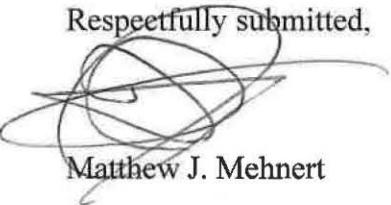
Hon. Anne Y. Shields, U.S.M.J.

Page 2

August 5, 2021

The Court's continuing attention to this matter is greatly appreciated.

Respectfully submitted,

  
Matthew J. Mehnert

Encs.

cc: Frederick Brewington, Esq. (via ECF only – without enclosures)  
James Murphy, Esq. (via ECF only – without enclosures)  
Steven Stern, Esq. (via ECF only – without enclosures)